

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA	*	CRIMINAL NO. 09-221
v.	*	SECTION: “R”
LEANDRA THORNTON	*	VIOLATION: 18 U.S.C. §1343

* * *

FACTUAL BASIS

Should this matter have gone to trial, the Government would have proved beyond a reasonable doubt, through the introduction of competent testimony and admissible tangible exhibits including the testimony of special agents of the Federal Bureau of Investigation (“FBI”), employees of the American Red Cross (“Red Cross”), and others, the following facts to support the allegations charged by the United States Attorney in the Bill of Information now pending against the defendant, **LEANDRA THORNTON**.

An employee of the Red Cross would testify that in the weeks and months after Hurricane Katrina, which struck southeastern Louisiana on August 29, 2005, the Red Cross maintained disaster recovery centers to assist victims of Hurricane Katrina. Through these recovery assistance efforts, the Red Cross provided financial assistance to residents displaced or otherwise affected by Hurricane

Katrina. People affected by the storms were able to apply for a one-time only financial grant of up to \$1,565 from the Red Cross. In order to receive these funds, applicants needed to present identification to a Red Cross representative that indicated residence in an affected zone. Applicants were also required to attest and sign a statement that read in part: "I certify that I have not received any undisclosed additional American Red Cross financial assistance."

Competent testimony would be introduced that once approved, the Red Cross made these disaster assistance funds available in one of four ways: (1) A personal check made payable to the applicant, issued on-site, and cashed with the assistance of the Red Cross; (2) A Red Cross-issued "Discover" card, issued on-site, and activated via phone by the applicant; (3) A Red Cross-issued "Client Assistance Card" ("CAC") card, issued on-site and activated via phone by the applicant; (4) A personal check authorized by the Red Cross, issued by Paychex.

Testimony by an employee of the Red Cross and admissible exhibits would be introduced to prove that the defendant, **LEANDRA THORNTON**, presented herself to Red Cross assistance centers on eleven (11) occasions between on or about September 9, 2005 and on or about October 5, 2005. On each visit, she applied for financial assistance and indicated that she had not received any other financial assistance from the Red Cross. As a result of her actions on these eleven applications, **THORNTON** received direct financial assistance from the Red Cross totaling \$15,685.00 of which \$14,085.00 was obtained by fraud.

An employee of Discover Card would testify that admissible records indicate that on or about October 1, 2005, a Discover Card was issued by the Red Cross to **THORNTON** at an assistance center located in Slidell, Louisiana. On or about October 2, 2005, a Discover card was activated and used by **THORTON** at a Circuit City Store in Slidell, Louisiana.

This use and activation in turn caused certain writings, signs, signals, and sounds to be sent from the point of purchase in Slidell, Louisiana, to Discover Card network computers in Dallas, Texas, authorizing and allowing the defendant, **THORNTON**, to effect a purchase at the Circuit City Store in Slidell, Louisiana.

READ AND APPROVED:

Virginia Schlueter (Date)
Counsel for Leandra Thornton ____/____/____

SPIRO G. LATSIS (Date)
Assistant U.S. Attorney ____/____/____

LEANDRA THORNTON (Date)
Defendant ____/____/____